CITY OF ENCINITAS
MULTI-006443-2023 (27 Single Family Homes)
501 Ocean Bluff Way
October 8, 2024

Vehicle Miles Traveled Analysis

Prepared by:

LOS Engineering, Inc.
11622 El Camino Real, Suite 100, San Diego, CA 92130
Phone 619-890-1253

Job #2222

Table of Contents

1.0 Introduction 1
1.1 Project Description 1
1.2 Project Trip Generation 1
2.0 Vehicle Miles Traveled 4
3.0 Conclusion 5

List of Figures

Figure 1: Project Location 2
Figure 2: Site Plan 3

List of Tables

Table 1: Project Traffic Generation 1

Appendices

Appendix A ..... Excerpts from OPR Technical Advisory
Appendix B ..... Excerpts from ITE Guidelines

1.0 Introduction

A VMT analysis is required to satisfy the California Environmental Quality Act (CEQA) guidelines that utilize VMT as the measure of mobility effectiveness for determining transportation impacts. The California Governor's Office of Planning and Research (OPR) Technical Advisory developed guidance on implementing Senate Bill 743 (SB 743) that shifts the transportation impact measure of effectiveness from Level of Service (LOS) to VMT.

1.1 Project Description

The proposed project is a 27-lot residential subdivision. The vacant project site is located at 501 Ocean Bluff Way in Encinitas, California. Project access is from two intersections on Ocean Bluff Way.

The regional location of the project is shown in **Figure 1**. A site plan is shown in **Figure 2.**

1.2 Project Trip Generation

Project traffic generation was calculated using the San Diego Association of Governments (SANDAG) trip rates from the *Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region*, April 2002. The project trip generation is calculated at 270 ADT, 21 AM peak hour trips (6 inbound and 15 outbound), and 27 PM peak hour trips (19 inbound and 8 outbound) as shown in **Table 1**.

TABLE 1: PROJECT TRAFFIC GENERATION

Proposed							AM				PM	
Land Use	Rate	Size & Units	ADT	Rate	Split		IN	OUT	Rate	Split	IN	OUT
Single Family Homes	10 /DU	27 DU	**270**	8%	0.3	0.7	**6**	**15**	10%	0.7 0.3	**19**	**8**

Source: SANDAG *Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region,* April 2002.

DU - Dwelling Units; ADT-Average Daily Traffic; Split-percent inbound and outbound.

Figure 1: Project Location

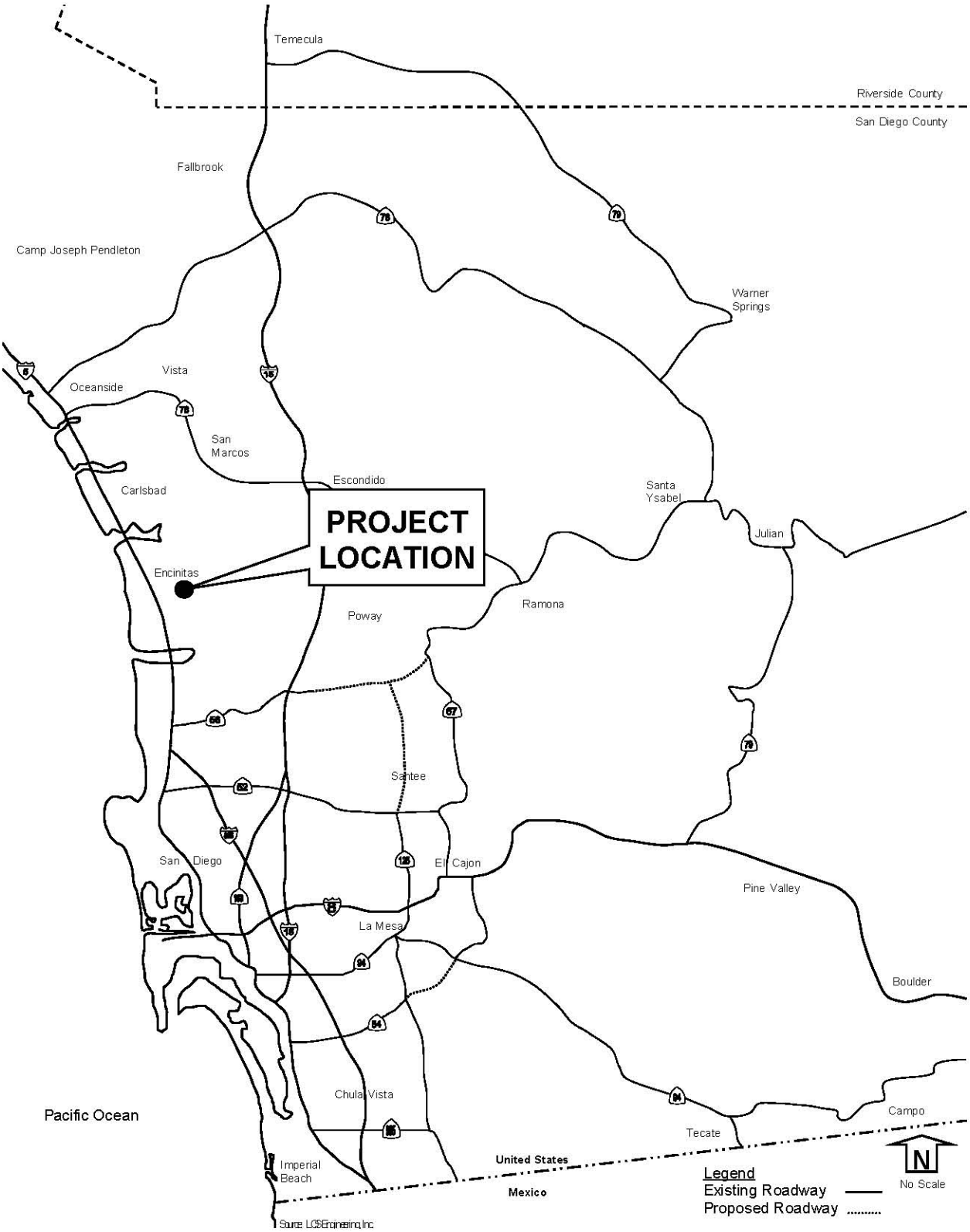
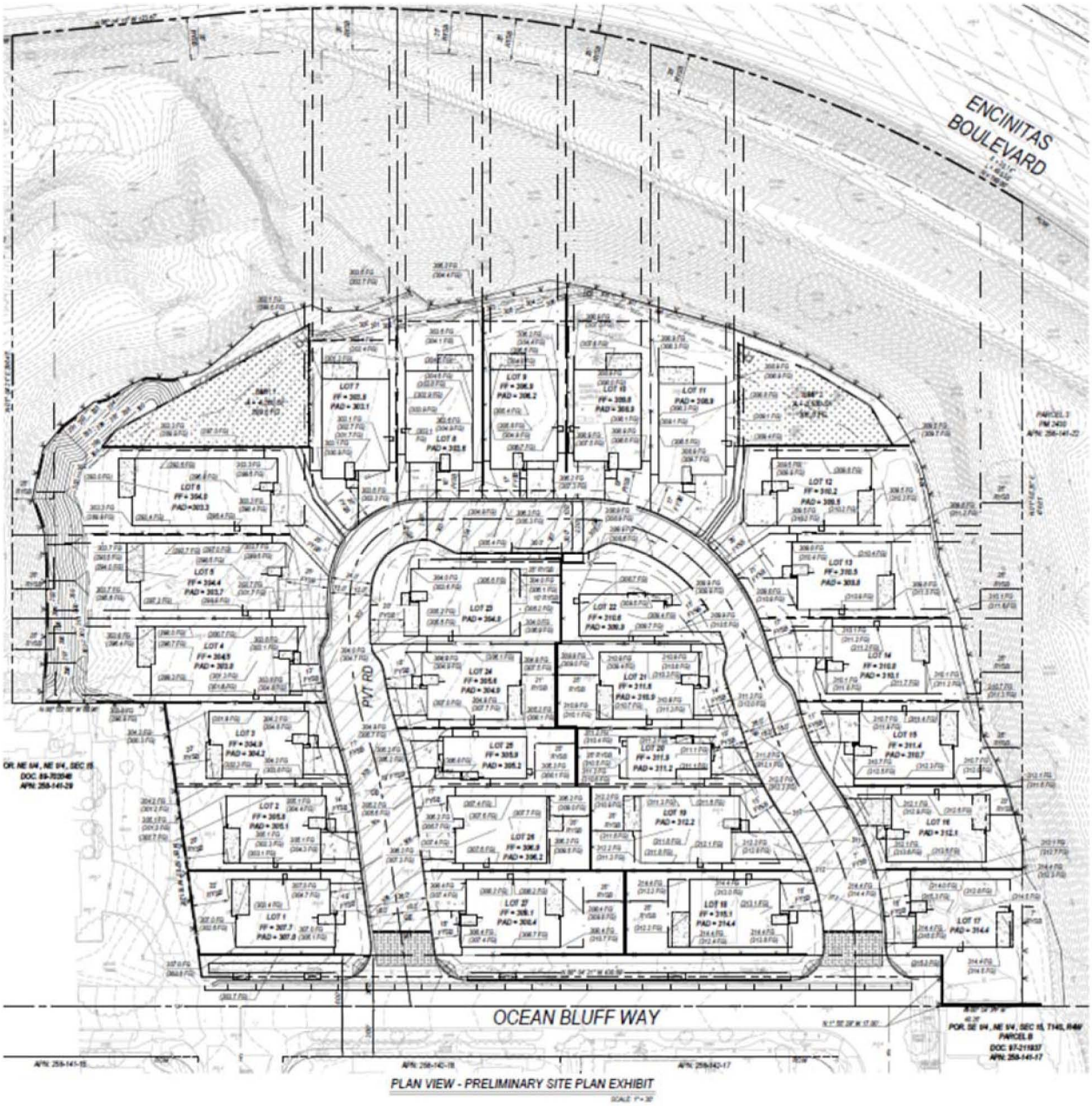


Figure 2: Site Plan



Source: PLSA

2.0 Vehicle Miles Traveled

A VMT analysis is required to satisfy CEQA guidelines that utilize VMT as the measure of effectiveness for determining transportation impacts. The California OPR Technical Advisory developed guidance on implementing Senate Bill 743 (SB 743) that shifts the transportation impact measure of effectiveness from LOS to VMT.

The OPR *Transportation Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018 states on page 8 "As noted above, lead agencies have the discretion to set or apply their own thresholds of significance". Excerpts from the OPR Technical Advisory are included in **Appendix A**.

The project was deemed submitted by City staff on 10/12/2023, which was prior to the City Council passing the current City of Encinitas SB 743 VMT Analysis Guidelines ("VMT Guidelines") on 11/8/2023.

Because this VMT analysis was completed prior to the adoption of the City VMT Guidelines, City of Encinitas Engineering Staff requested the VMT analysis to be based on the local San Diego Institute of Transportation Engineers (ITE) "Guidelines for Traffic Impact Studies in the San Diego Region", May 2019. The 2019 San Diego ITE guidelines state that projects with less than 1,000 Average Daily Traffic (ADT) that are consistent with the zoning are presumed to have less than significant VMT impacts. Excerpts from the ITE VMT Guidelines are included in **Appendix B**.

The project with a calculated trip generation of 270 ADT is less than the ITE threshold of 1,000 ADT; therefore, according to the San Diego ITE Guidelines, the project is presumed to have a less-than-significant VMT traffic impact and VMT mitigation measures are not recommended.

3.0 Conclusion

A VMT analysis is required to satisfy the CEQA guidelines that utilize VMT as the measure of mobility effectiveness for determining transportation impacts. The California Governor's Office of Planning and Research (OPR) Technical Advisory developed guidance on implementing Senate Bill 743 (SB 743) that shifts the transportation impact measure of effectiveness from LOS to VMT. The OPR *Transportation Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018 states on page 8 "As noted above, lead agencies have the discretion to set or apply their own thresholds of significance".

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Project traffic generation was calculated using SANDAG trip rates from the *Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region*, April 2002. The project trip generation is calculated at 270 ADT.

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Appendix A

Excerpts from OPR Technical Advisory

TECHNICAL ADVISORY

ON EVALUATING TRANSPORTATION IMPACTS IN CEQA

December 2018

D. General Principles to Guide Consideration of VMT

SB 743 directs OPR to establish specific "criteria for determining the significance of transportation impacts of projects[.]" (Pub. Resources Code, § 21099, subd. (b)(1).) In establishing this criterion, OPR was guided by the general principles contained within CEQA, the CEQA Guidelines, and applicable case law.

To assist in the determination of significance, many lead agencies rely on "thresholds of significance." The CEQA Guidelines define a "threshold of significance" to mean "an identifiable **quantitative, qualitative**[12] **or performance level** of a particular environmental effect, non-compliance with which means the effect will ***normally*** be determined to be significant by the agency and compliance with which means the effect ***normally*** will be determined to be less than significant." (CEQA Guidelines, § 15064.7, subd. (a) (emphasis added).) Lead agencies have discretion to develop and adopt their own, or rely on thresholds recommended by other agencies, "provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." (*Id.* at subd. (c); *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1068.) Substantial evidence means "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." (*Id.* at § 15384 (emphasis added); *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108-1109.)

Additionally, the analysis leading to the determination of significance need not be perfect. The CEQA Guidelines describe the standard for adequacy of environmental analyses:

> An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to **make a decision which intelligently takes account of environmental consequences**. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is **reasonably feasible**. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The **courts have looked not for perfection** but for **adequacy**, **completeness**, and a **good faith effort** at full disclosure.

(CEQA Guidelines, § 15151 (emphasis added).)

These general principles guide OPR's recommendations regarding thresholds of significance for VMT set forth below.

[12] Generally, qualitative analyses should only be conducted when methods do not exist for undertaking a quantitative analysis.

E. Recommendations Regarding Significance Thresholds

As noted above, lead agencies have the discretion to set or apply their own thresholds of significance. (*Center for Biological Diversity v. California Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 218-223 [lead agency had discretion to use compliance with AB 32's emissions goals as a significance threshold]; *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th at p. 1068.) However, Section 21099 of the Public Resources Code states that the criteria for determining the significance of transportation impacts must promote: (1) reduction of greenhouse gas emissions; (2) development of multimodal transportation networks; and (3) a diversity of land uses. It further directed OPR to prepare and develop criteria for determining significance. (Pub. Resources Code, § 21099, subd. (b)(1).) This section provides OPR's suggested thresholds, as well as considerations for lead agencies that choose to adopt their own

The VMT metric can support the three statutory goals: "the reduction of greenhouse gas emissions, the development of multimodal transportation networks, *and* a diversity of land uses." (Pub. Resources Code, § 21099, subd. (b)(1), emphasis added.) However, in order for it to promote and support all three, lead agencies should select a significance threshold that aligns with state law on all three. State law concerning the development of multimodal transportation networks and diversity of land uses requires planning for and prioritizing increases in complete streets and infill development, but does not mandate a particular depth of implementation that could translate into a particular threshold of significance. Meanwhile, the State has clear quantitative targets for GHG emissions reduction set forth in law and based on scientific consensus, and the depth of VMT reduction needed to achieve those targets has been quantified. Tying VMT thresholds to GHG reduction also supports the two other statutory goals. Therefore, to ensure adequate analysis of transportation impacts, OPR recommends using quantitative VMT thresholds linked to GHG reduction targets when methods exist to do so.

Various legislative mandates and state policies establish quantitative greenhouse gas emissions reduction targets. For example:

- Assembly Bill 32 (2006) requires statewide GHG emissions reductions to 1990 levels by 2020 and continued reductions beyond 2020.
- Senate Bill 32 (2016) requires at least a 40 percent reduction in GHG emissions from 1990 levels by 2030.
- Pursuant to Senate Bill 375 (2008), the California Air Resources Board GHG emissions reduction targets for metropolitan planning organizations (MPOs) to achieve based on land use patterns and transportation systems specified in Regional Transportation Plans and Sustainable Community Strategies (RTP/SCS). Current targets for the State's largest MPOs call for a 19 percent reduction in GHG emissions from cars and light trucks from 2005 emissions levels by 2035.
- Executive Order B-30-15 (2015) sets a GHG emissions reduction target of 40 percent below 1990 levels by 2030.

Appendix B

Excerpts from ITE Guidelines

GUIDELINES FOR TRANSPORTATION IMPACT STUDIES IN THE SAN DIEGO REGION

May 2019

4.0 INDIVIDUAL LAND DEVELOPMENT PROJECTS AND SPECIFIC PLANS

The recommended methodology for conducting a VMT analysis is based on guidance prepared by the California Governor's Office of Planning and Research (OPR) as provided in the published Technical Advisory on Evaluating Transportation Impacts in CEQA. At the time of writing of these guidelines, the current version of OPR's technical advisory was dated December 2018. The guidance recommended by OPR has been modified to be better suited to local conditions in the San Diego region. These modifications are noted in the details described later in this chapter.

The basic process is to compare a project's estimated VMT/capita or VMT/employee to average values on a regional, citywide, or community basis. The target is to achieve a project VMT/capita or VMT/employee that is 85% or less of the appropriate average based on suggestions in these guidelines. Note that lead agencies have discretion for choosing a VMT metric and threshold. The selection should represent how VMT reduction is balanced against other objectives of the lead agency and be supported by substantial evidence.

The methodology for determining VMT/capita or VMT/employee is related to the project's expected daily trip generation. The process for determining appropriate methodology to be used for conducting a VMT analysis for individual land development projects and specific plans is summarized in Figure 4-1.

The remainder of this section of the guidelines is divided into individual components that describe different aspects of the methodology. Other methodologies for VMT analysis could be considered at the discretion of the lead agency. However, it is recommended that any VMT methodologies within a particular analysis use consistent methodologies and that VMT analysis consider the differences between trip-based VMT analysis methodologies and tour-based VMT methodologies, as described in OPR's technical advisory.

MINIMUM PROJECT SIZE

It is recommended that lead agencies determine a minimum project size, below which VMT impacts are presumed to be less than significant. Two alternative approaches for determining minimum project size are described below.

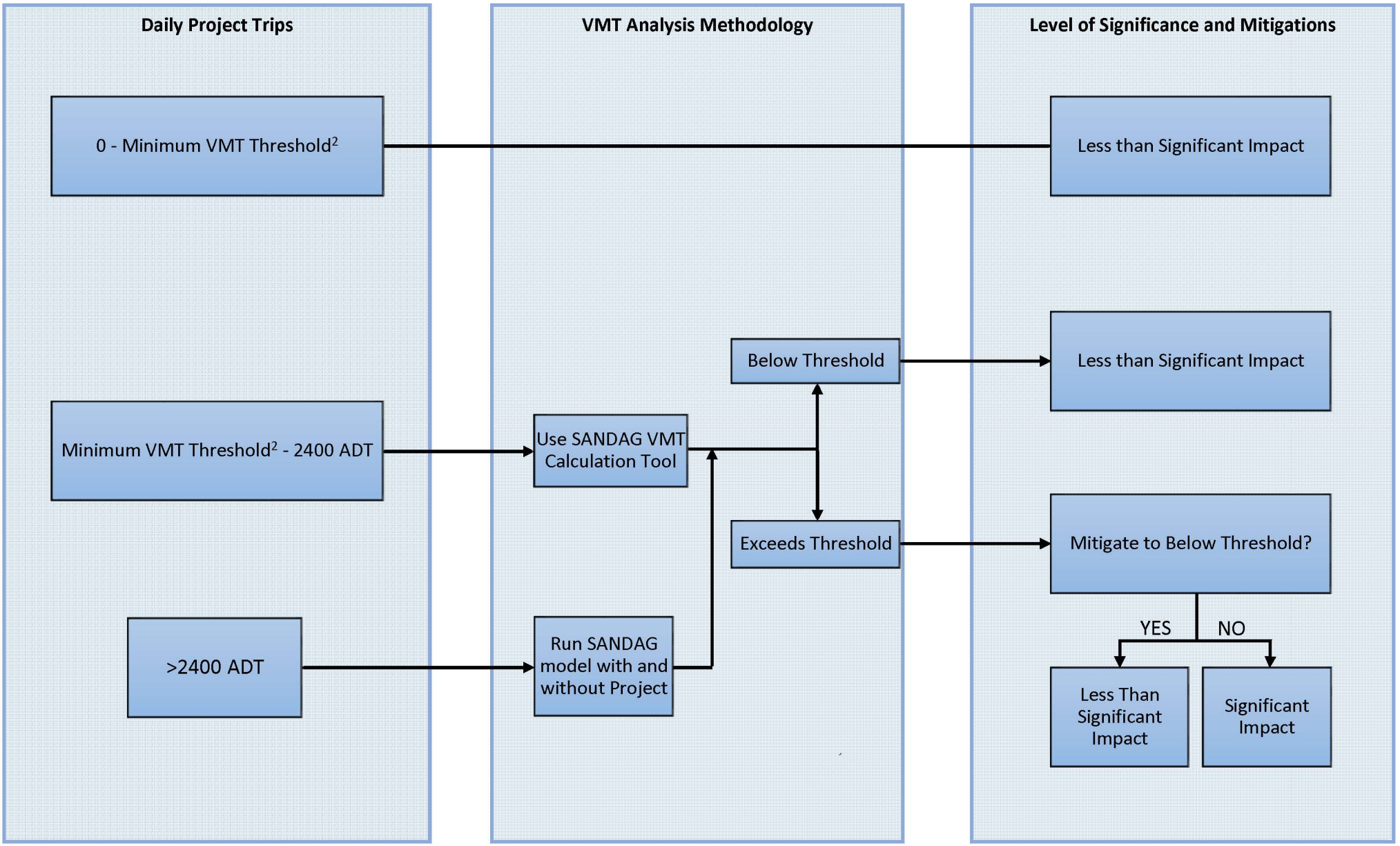
Alternative 1 – Minimum Project Size Based on Previous TIS Guidelines

Under this alternative, projects would be subjected to different levels of VMT analysis, depending on the size of the project and whether the project is consistent with the local jurisdiction's General Plan or Community Plan. Projects that are consistent with the General Plan or Community Plan are also considered to be consistent with the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

The determination of minimum project size for VMT analysis described below differs from the statewide guidance provided by OPR. It is based on regional standards for transportation analyses that were documented in the Guidelines for Traffic Impact Studies in the San Diego Region (ITE/SANTEC, 2000) and have been in use for over 19 years.

The following level of VMT analysis is recommended based on project size (expressed in terms of Average Daily Trips generated by the project; also known as ADT) and zoning:

Figure 4-1
VMT Analysis for Individual Land Development Projects[1]



Footnotes:

1. VMT impacts presumed to be less than significant for certain local-serving retail projects, affordable housing projects, and projects within transit priority areas. See text.
2. Minimum VMT threshold to be determined by lead agency.

Projects Inconsistent with General Plan or Community Plan

ADT	Level of Analysis
0 – 500	VMT Analysis Not Needed/VMT Impacts Presumed Less Than Significant
500 and Greater	VMT Analysis Recommended

Projects Consistent with General Plan or Community Plan

ADT	Level of Analysis
0 – 1,000	VMT Analysis Not Needed/VMT Impacts Presumed Less Than Significant
1,000 and Greater	VMT Analysis Recommended

The advantage of this alternative for determining minimum project size is that it is based on the engineering judgment of professionals who are experts in determining the effect of projects on the transportation system. It has been used successfully for over 19 years in the San Diego region and has received wide acceptance from the transportation profession, decision makers, and the public. Transportation engineers and planners who support this alternative for determining minimum project size consider it to be equally valid for the current LOS-based transportation analyses as well as the new VMT-based analyses taking effect on July 1, 2020.

Alternative 2 – Minimum Project Size Based on Statewide Guidance

Under this alternative, the minimum project size for VMT analysis would be based on statewide guidance provided by OPR. In OPR's technical advisory, the minimum project size is based a categorical exemption in CEQA that allows expansion of existing structures under certain circumstances. On page 12 of the December 2018 technical advisory, footnote 19, the following language describes the situation: "CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. [CEQA Guidelines, § 15301, subd. (e)(2).]"

OPR uses a general office building as the appropriate project type for the determination of minimum project size based on the exemption described above. Typical ITE trip generation rates are then applied to a 10,000 square-foot general office building which yields a minimum project size based on 110 daily trips.

If this alternative is used in the San Diego region, it is recommended that the use of regional or local trip generation rates be considered in addition to the typical trip generation rate used by OPR. For example, using the SANDAG trip generation manual (Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, April 2002), a standard commercial office would generate 20 daily trips per 1,000 square feet. Therefore, a 10,000 square-foot office would be expected to generate 200 daily trips and projects that generate less than 200 daily trips would not require a VMT analysis and would be presumed to have less than significant VMT impacts.

One advantage of this alternative is that it is based on statewide guidance with a reference to CEQA provisions. A second advantage is that it was developed in consideration of VMT as the performance measure for the determination of the transportation impacts of land development projects.